

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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In re:  
Shelley J. Tynan

Chapter 13 No. 14-45778

Debtor.

Hon. Walter Shapero

**OBJECTIONS TO CONFIRMATION**

NOW COMES CitiMortgage, Inc., by and through their attorneys, Trott & Trott, P.C., and hereby Objects to Confirmation as follows:

1. That Creditor is a holder of a mortgage on real property owned by the debtor(s) and located at 54902 Burlington Dr, Shelby Township, MI 48315-1639;

2. That the mortgage is in material default pursuant to the Creditor's Records filed by Creditor;

3. That the Debtor's Plan of Reorganization proposes to pay Creditor a regular monthly payment of \$2,329.00 and a pre-petition arrearage of \$47,310.85 at the rate of \$859.65 per month with 0% interest over 58 months;

4. That according to Creditor's Records , Creditor must receive the regular monthly payment of \$2,329.00 plus a pre-petition arrearage of \$61,942.27 at the rate of at least \$1,067.97 per month in order for the arrearage to be cured within the proposed length of time, i.e., 58 months;

5. That the Debtor's proposed Plan of Reorganization understates the pre-petition arrearage and the monthly payment on the pre-petition arrearage;

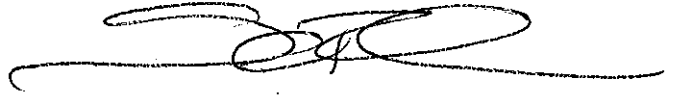
6. That the debtor's proposed Plan of Reorganization is underfunded;

**TROTT & TROTT, P.C.**  
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WHEREFORE, Creditor prays that Confirmation be denied.

Respectfully Submitted,  
Trott & Trott, P.C.

Dated: May 8, 2014



/S/ Shawn C. Drummond (P58471)  
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